

John H Schneider, MD, MS-ADR
Reg# 64084298
Metropolitan Correction Center
808 Union St
San Diego, CA 92101
Pro Se Defendant

IN UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

JIMMIE G. BILES, JR., MD,

Plaintiff

v.

JOHN H. SCHNEIDER, and MEDPORT,
LLC,

Defendants

JOHN H. SCHNEIDER,

Counter-Claimant

v.

JIMMIE G. BILES, JR.,

Counter-Defendant

CAUSE NO. 19-cv-48-F

**DEFENDANT AND COUNTER-
CLAIMANT JOHN H. SCHNEIDER'S
SECOND SUPPLEMENTAL RESPONSE
TO PLAINTIFF'S FIRST SET OF
DISCOVERY REQUESTS**

PROPOUNDING PARTY: Plaintiff and Counter-Defendant Jimmie G. Biles, Jr.

RESPONDING PARTY: Defendant and Counter-Claimant John H. Schneider

TO: Plaintiff and Counter-Defendant Jimmie G. Biles, Jr.

Pursuant to Federal Rules of Civil Procedure, Rule 26, Responding Party provides the following supplemental responses under oath to Propounding Party's corresponding Discovery Requests, Set One.

incarceration with the federal BOP, is unable to access his personal files as the sole and exclusive director, owner and operator of www.healthcare-malpractice.com and therefore cannot supply documents or cite factual and provable time lines in order to accurately respond to this interrogatory.

INTERROGATORY NO. 6.: Please state the facts that support the allegations contained in paragraph 14 of your Answer to Complaint and Counterclaims (ECF# 21), which was filed April 12, 2019.

RESPONSE: Schneider responds as follows: Schneider, as a consequence of his incarceration with the federal BOP, has no current access to any past answers, pleadings or filings he provided in this case and therefore cannot accurately answer Biles question on this matter.

SECOND SUPPLEMENTAL RESPONSE: Schneider responds as follows: Schneider denies Medport, LLC is John Schneider's alter-ego from both a legal consideration or definition and based upon the business history of this corporation. Medport, LLC functioned as a limited liability company in Wyoming between 2013-2018 and during this time, Medport, LLC remained in good standing in Wyoming as an LLC. At no time during this period was John Schneider an officer or shareholder of this corporation and Schneider never filed claims for distributions from this company's commercial products. In fact, John Schneider was considered and treated as an independent contractor for Medport, LLC during this time. Once all prior shareholders and officers relinquished their positions and claims in all manner from Medport, LLC in 2018, John Schneider became the sole proprietor and exclusive owner of Medport, LLC. John Schneider, recognizing that the LLC corporate structure was not appropriate for a sole proprietor, distributed all Medport assets, intellectual and otherwise, to John Schneider MD in 2018 with the intention of winding down and dissolving the corporation in 2018. Following John Schneider's arrest, for which he is currently serving a 24 month sentence with the federal BOP, John Schneider anticipated complete dissolution of Medport, LLC by years end 2018. Schneider became engrossed in legal issues surrounding his